

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	Case No. 1:20-CR-143
v.)	
)	Honorable T.S. Ellis, III
ZACKARY ELLIS SANDERS,)	
)	
<i>Defendant.</i>)	
_____)	

**MOTION TO SEAL GOVERNMENT’S REPLY TO DEFENDANT’S OPPOSITION TO
MOTION TO EXCLUDE EVIDENCE AT TRIAL OR, IN THE ALTERNATIVE,
TO CONTINUE THE TRIAL**

The United States of America, by and through its undersigned counsel and pursuant to Local Criminal Rule 49(C) and 49(E), moves to file under seal an un-redacted version of its reply to the defendant’s opposition to the government’s motion to exclude evidence at trial or, in the alternative, to continue the trial, a redacted version of which has been publicly filed as Dkt. No. 383. An un-redacted version will be delivered to the clerk’s office with a copy of this motion and provided to opposing counsel. A proposed Order is attached for the consideration of the Court.

The government’s filing addresses concerns regarding the defendant’s medical information, as well as sensitive material covered by the Protective Orders in this matter. Redactions are therefore necessary to safeguard the privacy of the defendant and his medical information, as well as this sensitive discovery material. Counsel for the government has considered procedures other than redacting the public version of its reply and sealing the unredacted version of this filing, and none will suffice to protect this information from disclosure.

The Court has supervisory power over its own records and may, in its discretion, seal

